

1 Leslie Bryan Hart, Esq. (SBN 4932)
2 Brandi M. Planet, Esq. (SBN 11710)
3 FENNEMORE CRAIG, P.C.
4 300 E. Second St., Suite 1510
5 Reno, Nevada 89501
6 Tel: 775-788-2228
7 lhart@fclaw.com; bplanet@fclaw.com

8 *Attorneys for Defendant Renato Libric*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 MOOSE RUN, LLC,

12 Plaintiff,

13 vs.

14 RENATO LIBRIC, individually; and DOES 1-
15 10,

16 Defendants.

CASE NO.: 2:18-cv-00425-GMN-NJK

17 **MOTION AND ~~PROPOSED~~ ORDER**
18 **TO WITHDRAW AS COUNSEL OF**
19 **RECORD**

20 Leslie Bryan Hart and Brandi M. Planet respectfully move this Court for an order
21 permitting Leslie Bryan Hart, Esq. and Brandi M. Planet, who have appeared in these
22 proceedings, and the law firm Fennemore Craig, P.C. to withdraw as local counsel for Defendant
23 Renato Libric in the above captioned matter pursuant to Local Rule IA 10-6.

24 This Motion is made and based upon the following Memorandum of Point and
25 Authorities, the Declaration of Leslie Bryan Hart ("Hart Decl.") attached hereto as **Exhibit A**,
26 the pleadings and papers on file herein, and oral argument, if any, requested by the Court.

27 DATED: June 4, 2018.

28 **FENNEMORE CRAIG, P.C.**

By: /s/ Leslie Bryan Hart
Leslie Bryan Hart, Esq. (SBN 4932)
Brandi M. Planet, Esq. (SBN 11710)
300 E. Second St., Suite 1510
Reno, Nevada 89501
Tel: 775-788-2228 Fax: 775-788-2229
lhart@fclaw.com; bplanet@fclaw.com

Attorneys for Defendant Renato Libric

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Local Rule IA 10-6 (b) provides, "No attorney may withdraw after appearing in a case
3 except by leave of court after notice served on the affected client and opposing counsel."
4 Additionally, Local Rule IA 10-6 (e) provides, "[N]o withdrawal or substitution shall be approved if
5 delay of discovery, the trial or any hearing in the case would result."

6 Ms. Hart has provided notice to Renato Libric's lead counsel, George E. Kostel, Esq. and
7 Jason Matechak at Impresa Legal Group (who had previously intended to seek permission to
8 appear in this case pro hac vice), of her intent to withdraw on or about May 16, 2018. *See* Exhibit
9 A, Hart Declaration, at ¶ 3. Such notice was given after Libric not only failed to fulfill the
10 obligations of the engagement agreement he entered with Fennemore Craig, P.C., but also upon Ms.
11 Hart being advised by lead counsel on May 10, 2018, that Mr. Libric was taken into custody and is
12 currently being held in the San Mateo County Jail in California. Ms. Hart has not had any direct
13 communication with Mr. Libric, and such is not possible at this time for the reason set forth above,
14 although a copy of this Motion will be emailed to Mr. Libric at the email address he previously
15 provided.

16 Opposing counsel in this case will receive notice of this Motion to Withdraw via the
17 CM/ECF system, pursuant to the certificate of service below.

18 Withdrawal of Ms. Hart and Ms. Planet and the law firm Fennemore Craig, P.C. will not
19 result in delay of discovery, trial, or any hearings as Mr. Libric has now appeared through new
20 Nevada counsel.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CONCLUSION

For the reasons set forth above, Ms. Hart, Ms. Planet and the law firm Fennemore Craig, P.C. move this Court to enter an order approving their withdrawal as representing attorneys for Renato Libric in the instant matter.

DATED: June 4, 2018.

FENNEMORE CRAIG, P.C.

By: /s/ Leslie Bryan Hart
Leslie Bryan Hart, Esq. (SBN 4932)
Brandi M. Planet, Esq. (SBN 11710)
300 E. Second St., Suite 1510
Reno, Nevada 89501
Tel: 775-788-2228 Fax: 775-788-2229
lhart@fclaw.com; bplanet@fclaw.com

Attorneys for Defendant Renato Libric

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 5, 2018